

UNITED STATES GOVERNMENT
MEMORANDUM

DATE: December 2, 1999
REPLY TO: DOCKET FILE COPY ORIGINAL
ATTN OF: Nancy Walls, OET
SUBJECT: ET Docket No. 99-300 Comments
TO: Bill Caton

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Attached are 2 copies each of comments that were e-mailed directly to Robert Eckert. Please have these comments placed in the docket file for ET Docket 99-300.

Nancy Walls
Thanks

From: "Glenn S Rabin" <Glenn.S.Rabin@alltel.com>
To: "reckert@fcc.gov" <reckert@fcc.gov>
Date: Fri, Oct 29, 1999 6:17 PM
Subject: ALLTEL Comments on ETDocket No. 99-300

Gentlemen:

Attached (in Word) are the Comments of ALLTEL Communications, Inc.
in ET Docket No. 99-300 per Public Notice, DA 99-2130 (released
October 8, 1999).

Our thanks for your consideration.

Glenn Rabin

CC: "mliebman@FCC.gov" <mliebman@FCC.gov>

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Before the
Federal Communications Commission
Washington, D.C. 20554

In re the Matter of)
)
Methods for Verifying Compliance) Docket No. ET 99-300
With E911 Accuracy Standards)
)

Comments of ALLTEL Communications, Inc.

ALLTEL Communications, Inc.¹ hereby submits its comments in response to the Office of Engineering and Technology's ("OET") and the Wireless Telecommunications Bureau's ("WTB") request for information on the methods for verifying compliance with E911 accuracy standards.²

The OET and the WTB seek input on the methodology to be employed to verify compliance with accuracy standards for location information. As an initial matter, ALLTEL is constrained to note that the revised accuracy standards adopted in the Commission's recently released Third Report and Order³ were based largely on vendor

¹ ALLTEL Communications, Inc. ("ACI") directly and through various companies affiliated by virtue their common ownership by ALLTEL Corporation, is one of the leading providers of CMRS services in the country with well over four million cellular subscribers. The ALLTEL affiliated companies serve a variety of markets including numerous rural markets.

² See, Public Notice, DA99-2130 (released October 8, 1999) (the "Public Notice")

³ In the Matter of Revision of the Commission's Rules To Ensure Compatibility With Enhanced 911 Emergency Calling Systems, Third Report and Order in CC Docket No. 94-102, RM-8143, FCC 99-245 (released October 6, 1999) ("Third Report and Order").

claims and preliminary data from trials conducted for select technologies and digital formats. Consequently, the Public Notice solicits comment on developing verification standards for location accuracy requirements that have not yet been definitively proven to be achievable across all technologies and all system deployments.

Generally, ALLTEL believes that the Commission must make a distinction between technology validation (which should be the province of the vendor) and validation of a particular deployment. Carriers should not be required to revalidate each location technology, but only verify that it has been implemented properly within the carrier's service area (or region, market or network basis at the carrier's discretion). Sample points for deployment validation should be weighted according to wireless calling patterns in particular markets and include only those areas within a geographic territory where reliable service has been achieved. In short, verification methodologies should be flexible so that a carrier may adopt it to the particular characteristics of its service area and deployment.

With respect to handset-based location technology, ALLTEL advocates that the technology be validated once by vendors through extensive trials in a "type-acceptance" type process across various technologies. Network-based technologies will, however, require deployment-wide verification. ALLTEL suggests that carriers, under the guidance of the Commission and with its approval, be permitted the latitude to use validated predictive models and supplement results as may be needed with sample

testing.⁴ In this way, network-based deployments may compensate for the market-specific situations encountered by carriers within their particular market areas.

ALLTEL looks forward to providing additional contributions as both the OET and WTB further consider verification methodologies.

Respectfully submitted,

ALLTEL Communications, Inc.

By: _____

Glenn S. Rabin
Assistant Vice President
Federal Regulatory Affairs

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Dated: October 29, 1999

⁴ ALLTEL notes that where carriers elect to utilize the services of independent location networks, the burden of verification of deployment should rest on the location network provider.